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November 4, 2010

**VIA ELECTRONIC SUBMISSION**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: **Video Device Competition: Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment, MB Docket No. 10-91, CS Docket No. 97-80, PP Docket No. 00-67.**

Dear Ms. Dortch:

On November 3, 2010, Hank Hultquist, Christopher Boyer, Christopher Heimann, and I, representing AT&T, met with the following members of the Media Bureau: William Lake, Nancy Murphy, Mary Beth Murphy, Steven Broeckaert, Alison Neplokh, Brendan Murray, and Jeffrey Neumann. On November 4, 2010 these same AT&T representatives met with Paul de Sa, Chief, Office of Strategic Planning & Policy Analysis.

The purpose of these meetings was to discuss AT&T comments as filed in the above referenced proceeding. AT&T indicated its support for the Commission's objective of a retail market for consumer electronic (CE) devices that are interoperable with multichannel video program distributor (MVPD) services. AT&T emphasized that from the conception of its IPTV U-verse TV service offering it never had an interest in being the exclusive provider of equipment for its video service and has taken active steps in pursuing a robust market for devices that interoperate with U-Verse TV. As far back as 2006 AT&T worked with the consumer electronics industry in furtherance of a gateway/home networking model. The development of this model ultimately foundered over an impasse regarding the extent to which the gateway framework would ensure that CE equipment faithfully rendered the MVPD's particular user interface and electronic programming guide. In 2008 AT&T tested a gateway model in its labs jointly with Samsung as a proof of concept gateway approach that would faithfully render the MVPDs service on a third party device. In furtherance of AT&T's goal to pursue a variety of devices that enable consumers to access AT&T's U-Verse TV service, U-Verse TV subscribers are now able to access the service through Microsoft's X-Box 360 and AT&T is currently working on other fixed and mobile device opportunities for rendering the U-Verse TV experience.

AT&T stressed that the marketplace for video navigation devices has never been as dynamic as it is today. Consumers have multiple options with multiple online streaming

services available with a variety of products that bring over-the-top (OTT) content directly to consumers, including to the TV. There are a host of devices and applications that allow consumers to view Internet and other content on the same devices they use to watch their MVPD service.

AT&T expressed concern that the Commission's ALLVid proposal presents a substantial risk of slowing or inhibiting continued innovation in the development of retail devices that can take advantage of the robust capabilities inherent in AT&T's all-IP video platform. AT&T stated its belief that pursuing the Commission's ALLVid proposal would be counter-productive not only because of its potential to undermine business case fundamentals inherent in AT&T's pursuit of an IPTV video delivery platform, but also because of its potential to homogenize the services of competing MVPDs.

If you have any questions, please do not hesitate to contact me at (202) 457-3010.

Sincerely,

A handwritten signature in blue ink, appearing to read "James K. Smith", with a stylized, cursive script.

James K. Smith

cc: William Lake  
Nancy Murphy  
Mary Beth Murphy  
Steven Broeckaert  
Alison Neplokh  
Brendan Murray  
Jeffrey Neumann  
Paul de Sa